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10 Attorneys for Defendant
11 NATIONWIDE MUTUAL INSURANCE
COMPANY

12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
16

17 JULIAN FRASER, JOSEPH WUCHER,
18 IRENE DAMSKY, KIM ZAIA, and
CHRIS JACKSON as individuals and in
their representative capacity,

19 Plaintiffs,

20 v.

21 NATIONWIDE MUTUAL INSURANCE
22 COMPANY, a corporation,

23 Defendant.

Case No. 3:17-cv-03702-EMC

**JOINT STIPULATION AND PROPOSED
ORDER ENLARGING TIME TO FILE
RULE 26(F) REPORT AND JOINT CASE
MANAGEMENT STATEMENT**

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25 Plaintiffs JULIAN FRASER, JOSEPH WUCHER, IRENE DAMSKY, KIM ZAIA, and
26 CHRIS JACKSON, by and through their counsel of record, Rudy, Exelrod, Zieff & Low, LLP, and
27 Defendant NATIONWIDE MUTUAL INSURANCE COMPANY, by and through their respective
28 counsel of record, Littler Mendelson, PC, hereby stipulate and agree as follows:

**JOINT STIPULATION AND PROPOSED
ORDER**

(No. 3:17-cv-03702)

1 1. On June 28, 2017, Plaintiffs filed a Complaint alleging that Defendant violated
2 various California wage and hour laws with respect to the terms and conditions of Plaintiffs'
3 employment.

4 2. On June 29, 2017, this matter was initially assigned to Magistrate Judge Sallie Kim.
5 Judge Kim ordered the Initial Case Management Conference to take place on October 2, 2017 at
6 1:30 p.m. and the Rule 26(f) Report and Case Management Statement to be filed on September 25,
7 2017.

8 3. On August 23, 2017, this matter was reassigned from Judge Kim to Judge Edward M.
9 Chen. (See Doc. # 24, Order Reassigning Case). The reassignment order vacated all hearing dates
10 and trial dates then presently scheduled.

11 4. As of the date of filing of this Stipulation, the Court has not yet rescheduled the date
12 of the Initial Case Management Conference.

13 5. On September 25, 2017, counsel for the parties met telephonically to discuss the
14 Initial Case Management Conference and the parties' anticipated filing of their Rule 26(f) Report
15 and the Joint Case Management Statement. Because no Initial Case Management Conference is
16 currently scheduled, the parties agreed to request of the Court that the deadlines associated with the
17 Initial Case Management Conference be continued.

18 6. The parties therefore request that the parties' deadline to file a Joint Rule 26(f) Report
19 and Joint Case Management Statement, and to serve their respective Rule 26(a) initial disclosures, be
20 set to either October 16, 2017 or twenty-one (21) days in advance of the date of the rescheduled
21 Initial Case Management Conference, to be determined by the Court, whichever is later.
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1 Dated: September 25, 2017

/s/ John S. Hong
JOHN S. HONG
LITTLER MENDELSON, P.C.
Attorneys for Defendant
NATIONWIDE MUTUAL INSURANCE
COMPANY

5 Dated: September 25, 2017

/s/ Chaya Mandelbaum
CHAYA MANDELBAUM
RUDY, EXELROD, ZIEFF & LOWE, L.L.P.
Attorneys for Plaintiff
JULIAN FRASER, *et al.*

12 **IT IS SO ORDERED.**

14 DATED: 9/26/17



HONORABLE EDWARD M. CHEN
UNITED STATES DISTRICT JUDGE

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